United States Department of Agriculture
Food Safety And Inspection Service
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AUDIT REPORT FOR POLAND

MAY 22 THROUGH JUNE 8, 2000

April 9, 2001

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Poland's meat inspection system from May 22 through June 8, 2000. Seven of the eighteen establishments certified to export meat to the United States were audited. Six of these were combined slaughter/processing establishments; the remaining one was conducting processing operations.

The last audit of the Poland's meat inspection system was conducted in May/June 1999. Eight establishments were audited: six were acceptable (33, 58, 67, 73, 201 and 268), one was evaluated as acceptable/re-review (65), and one was unacceptable (267). Five major deficiencies were reported at that time: Establishment 267, did not have adequate controls in place to prevent, detect, control and correct product contamination/adulteration of meat and meat product. This deficiency was not observed during this audit. The daily pre-operational and operational sanitation was deficient in Establishments 58, 65, 73 201 and 268. None of these establishments were included in the new itinerary. A species verification testing program was not implemented in Establishments 33, 58, 65, 67, 201, 267 and 268. Poland has asked for exception from testing for species and was presently not performing species verification. Poland's meat inspection officials were not adequately verifying the establishments' HACCP plan for monitoring critical control points, corrective actions, recordkeeping systems and verification procedures. Most of these deficiencies had been corrected by Polish inspection service.

Beef and pork products are eligible for export to the U.S.

During the period from January 1 to April 30, 2000 Poland establishments exported nearly 4,813,673 million pounds of pork product to the U.S. Port-of-entry rejections for transportation damage and container condition and for violative net weight were 21357 pounds. Currently, Poland is under APHIS restriction for BSE.

PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with Poland national meat inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the meat inspection headquarters facilities preceding the on-site visits. Three establishments that regularly export to the United States and three establishments that do not regularly export to the U.S. were selected for records review. The third was conducted by on-site visits to seven establishments. Six establishments were selected randomly, while one establishment delisted during the previous audit was added to the list of establishments scheduled for on-site audit. The fourth was a visit to two laboratories, one performing analytical testing of field samples for the national residue testing program, and the other culturing field samples for the presence of microbiological contamination with *Salmonella*. Poland doesn't use private laboratories for microbiological testing.

Program effectiveness determinations focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the *E. coli* testing program, and (5) enforcement controls, including the testing program for *Salmonella* species. Poland's inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials (this was not the case with any establishment).

RESULTS AND DISCUSSION

Summary

Effective inspection system controls were found to be in place in all seven establishments audited; one of these (Est. 30180603) was recommended for re-review. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli* are discussed later in this report.

HACCP-implementation deficiencies had been found in all eight establishments visited during the previous audit. During this new audit, implementation deficiencies were found in the HACCP programs of three (Ests. 33, 45 and 268) of the seven establishments visited. Details are provided in the Slaughter/ Processing Controls section in this report. One was a repeated deficiency.

Entrance Meeting

On May 24, an entrance meeting was held at the General Veterinary Inspectorate offices of the *Poland National Veterinary Services*, and was attended by; Dr. Robert Gmyrek, Deputy Chief Veterinary Officer, General Veterinary Inspectorate; Dr. Adam Jarecki, Head of Division for European Integration and Foreign Co-operation Division, General Veterinary Inspectorate; Mr. Stanley Phillips, Agricultural Attaché, United States Embassy Warsaw; Mr. Piotr Rucinski, Agricultural Specialist, U.S. Embassy Warsaw; Dr. Ghias Mughal, Branch Chief, International Audit Staff; and Dr. Oto Urban, Auditor, International Audit Staff, USDA/FSIS. Topics of discussion included the following:

1. Structure and function of Poland National Veterinary Services.

2. Structure and function of residue and microbiology laboratories.

3. Changes in the audit's itinerary.

4. Disease status according to APHIS.

5. Control of *Listeria monocytogenes.*

A short meeting was also held with Mr. Stanley Phillips, Agricultural Attaché; Mr. Piotr Rucinski, Agricultural Specialist, Dr. Ghias Mughal, Branch Chief, International Audit Staff and Dr. Oto Urban, Auditor, International Audit Staff at the U.S. Embassy in Warsaw.

Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of Poland's inspection system in May/June 1999, except that Dr. Robert Gmyrek was appointed to the position of Deputy Chief Veterinary Officer.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to the establishments listed for records review. This records review was conducted at the headquarters. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training records for inspectors and laboratory personnel.
- Label approval records such as generic labels, and animal raising claims.
- New laws and implementation documents such as regulations, notices, directives and guidelines.

- Sampling and laboratory analyses for residues.
- Pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs, generic *E. coli* testing and *Salmonella* testing.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials.
- Export product inspection and control including export certificates.
- Enforcement records including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

The following concerns arose as a result the examination of these documents:

1. Ests. 46 and 101 did not have written HACCP verification programs.
2. Est. 67 did not address in its written HACCP program verification for control of biological, chemical, and physical hazards, and a verification program for CCPs was missing. Additionally, microbiological standard violations were recorded twice in the SSOP but no corrective action was indicated.

Government Oversight

All inspection veterinarians and inspectors in establishments certified by Poland as eligible to export meat products to the United States were full-time General Veterinary Inspectorate employees, receiving no remuneration from either industry or establishment personnel.

Establishment Audits

Eighteen establishments were certified to export meat products to the United States at the time this audit was conducted. Seven establishments were visited for on-site audits. In six of the seven establishments visited, both National Veterinary Service (NVS) inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products. In Est. 30180603, which was evaluated as acceptable/re-review, problems were found with pre-operational sanitation and pest controls, and corrective actions were not adequate, but no direct product contamination was observed.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information about the following risk areas was also collected:

1. Government oversight of accredited and approved laboratories. There are no private laboratories in Poland.
2. Intra-laboratory quality assurance procedures, including sample handling.

3. Methodology.

The Veterinary Drug Residues Laboratory in Pulawy was audited on May 31, 2000. Field Residue/Microbiology Laboratory (Zaklad Higieny Weterynaryjnej) in Poznan was audited on June 6, 2000. Except as noted below, effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions. The methods used for the analyses were acceptable.
Expiration dates were missing on some standards in the residue laboratory in Pulawy.
This laboratory also performs bacteriological analysis but only for non-HACCP/PR *Salmonella* and *E. coli* samples.
Poland's microbiological testing for *Salmonella* was being performed in government laboratories. One of these, the Zaklad Higieny Weterynaryjnej (ZHW) in Poznan was audited. The pages of some laboratory books in the laboratory at Poznan were not numbered.
The intralaboratory check samples given to the analyst did not meet U.S. requirement. The supervisor was not sure of the check sample concentration.

Establishment Operations by Establishment Number

The following operations were being conducted in the seven establishments:

Beef and pork slaughter, boning, cured (dried) smoked products, cooked sausages and canning - three establishments (66, 267 and 131)
Beef and pork slaughter, boning, cured (dried) smoked products and cooked sausages – four establishments (45, 33, 268 and 30180603)

SANITATION CONTROLS

Based on the on-site audits of establishments, Poland's inspection system had controls in place for: water potability records, chlorination procedures, back-siphonage prevention, hand washing facilities, separation of establishments, pest control program, temperature control, lighting, inspector work space, ventilation, facilities approval, equipment approval, product contact equipment, other product area, dry storage areas, welfare facilities, outside premises, personal dress and habits, personal hygiene practices, sanitary dressing procedures, product handling and storage, product reconditioning, product transportation, effective maintenance program, operational sanitation and waste disposal.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements, with only occasional minor variations. The following deficiencies were found with regard to the SSOP requirements:

1. There was inadequate identification of pre-operational procedures in their written SSOPs, distinguishing them from sanitation activities to be carried out during operations in Ests. 66 and 268. The establishment management will correct this deficiency.
2. The written description of corrective actions taken in response to findings in the boning room were inadequate in Ests. 33 and 66. This deficiency will be corrected in both establishments.

Vermin Controls Procedures

1. Rodent control bait station (box) was observed to be empty in Establishment 45. The contracted company is going to be informed about this deficiency.

2. Mosquitoes, flies and spider web were present in the processing area and spice room in Establishment 30180603. No immediate corrective action was taken by the establishment or inspection officials.

Operational Sanitation

At the carcass decontamination unit station, carcasses were being contaminated by coming in contact with the vacuum hose that was touching the floor in Establishment 131. The corrective action was taken immediately.

Over-product ceilings and equipment

1. Flaking paint was observed in areas of cooler and hallway in Establishments 66 and 131. This deficiency was scheduled for corrective action.

2. Condensation was observed directly over a product flow area in Establishment 131 and the chiller in Establishment 30180603. Corrective action was taken in Establishment 131 by the establishment management but not in Establishment 30180603 either by establishment or Inspection Service.

3. Non-dripping condensation was observed over carcasses at the sanitary slaughter in Establishment 268. The corrective action was taken immediately by the establishment officials.

4. Frozen condensation was observed in the freezer of Establishment 268. This deficiency was programmed for correction by the establishment officials.

5. Dripping water from pipes over a product flow area on the kill floor was observed in Establishment 45. This deficiency was corrected immediately.

6. Rusty equipment (hooks, pipes) were observed in Establishments 66 and 267. This deficiency was programmed for correction by the establishment officials.

Ante-mortem Facilities

The same drinking water container was used for both suspect animals and animals that had passed the ante-mortem inspection in Est. 267. The corrective action was scheduled by the Polish Inspection Service for a later date.

Sanitizers

Water temperature observed was below required 180ºF level in Establishment 33. Thermometers were not functional in Establishments 268 and 45. These deficiencies were corrected immediately in all establishments.

Cross-Contamination

Offals were contaminated during dressing procedure by contacting the floor in Establishment 267. This was corrected immediately by the establishment management.

Preoperational Sanitation

1. Meat tenderizer, ready for use, had not been cleaned in Establishment 267. This deficiency was corrected immediately by establishment officials.

2. Edible product containers were not properly washed on the preoperational sanitation in Establishment 30180603. No corrective action was taken by either establishment or inspection officials.

Equipment Sanitizing

1. Viscera pans were not being properly rinsed between use in Establishment 33. This was corrected immediately by the establishment management.
2. Edible product trays were not properly washed in Establishment 30180603. No corrective action was taken by either the establishment or Inspection Service.

ANIMAL DISEASE CONTROLS

With the exceptions listed below, Poland's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework product.

Carcasses on the suspect line were not properly segregated and some of them were contacting each other in Est 267. This was corrected immediately by the inspection service.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit.

Poland has a system in place through which slaughter animals could be reliably traced back to the farms of origin.

Currently, BSE has not been reported in Poland, but the country was under APHIS restriction for this disease. Poland is free of Classical Swine Fever. However, Swine Vesicular Disease is still present in Poland.

RESIDUE CONTROLS

Poland's National Residue Testing Plan for 2000 was being followed, and was on schedule. Poland inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.

SLAUGHTER/PROCESSING CONTROLS

Poland inspection system had controls in place to ensure adequate requirements for humane slaughter, post-mortem disposition, condemned product control, restricted product control, returned and reworked product, pre-boning trim, ingredients identification, control of restricted ingredients, formulations, packaging materials, laboratory confirmation, label approvals, special label claims, inspector monitoring, processing schedules, processing equipment, processing records, empty can inspection, filling procedures, container closure exam, interim container handling, post-processing handling, incubation procedures, processing defect actions by the establishment, and inspection processing control.

It was not clear from the observation and discussion, who was performing boneless meat reinspection and when and when it was being done.

HACCP Implementation

All establishments approved to export meat products to the U.S. are required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

The HACCP programs were found to meet the basic FSIS regulatory requirements. However, the following deficiencies were observed with HACCP implementation:

1. In general, the corrective action was addressed but the preventive action was missing.
2. CCP verification was missing in Establishments 33 and 45.
3. Written HACCP did not have zero tolerance for fecal contamination in Establishment 268.

4. Reassessment of HACCP was not identified by signature and date in Establishment 33.

Testing for Generic *E. coli*

Poland has adopted the FSIS regulatory requirements for *E. coli* testing.
Six of the establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing, and were audited and evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment C).

The *E. coli* testing programs were found to meet the basic FSIS regulatory requirements.

Polish establishments have been using government laboratories for *E. coli* testing. The criteria used for equivalence decisions for use of government laboratories in lieu of private laboratories are:

- The laboratory has properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
- Results of analyses, including all permanently recorded data and summaries, are reported promptly to the establishment.

Additionally, establishments had adequate controls in place to prevent meat products intended for Poland domestic consumption from being commingled with products eligible for export to the U.S.

ENFORCEMENT CONTROLS

Inspection System Controls

Except as noted below, the Poland inspection system controls [ante-and post-mortem inspection procedures and dispositions, control of restricted product and inspection samples, control and disposition of dead, dying, diseased or disabled animals, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, the importation of only eligible livestock from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat or poultry products from other counties for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Testing for *Salmonella* Species

Six of the establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

Poland has adopted the FSIS regulatory requirements for *Salmonella* testing.
The *Salmonella* testing programs were found to meet the basic FSIS regulatory requirements.

Species Verification

Poland has requested exemption from testing for species and was not performing species verification at the present time.

Monthly Reviews

These reviews were being performed by the Polish equivalent of Circuit Supervisors. All were veterinarians with several years of experience. The internal review program was applied equally to both export and non-export establishments. Internal review visits were announced in advance, and were conducted, at times by individuals and at other times by a team of reviewers, at least once monthly. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in the National Veterinary Service offices in Warsaw, and were routinely maintained on file for a minimum of 3 years.

In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility to be reinstated, there must be an in-depth review by the regional inspection service. The results are reported to headquarters in Warsaw, where a determination about the establishment's reinstatement is made by the higher-level officials.

Enforcement Activities

General Veterinary Inspectorate takes legal action against meat hygiene violators, issues fines, and removes establishments in violation from the list of exporting establishments to the U.S. Administrative and criminal enforcement of laws and regulation regarding meat inspection are initiated by the Ministry of Agriculture and carried out by the Justice Ministry.

Exit Meetings

An exit meeting was conducted in Warsaw on June 8. The Poland participants were: Dr. Andrzej Komorowski, Chief Veterinary Officer; Dr. Robert Gmyrek, Deputy Chief Veterinary Officer; Dr. Jan Z. Szymborski, Head of the Veterinary Public Health Division;

22 Regional and Area Directors; Mr. Jim Higgiston, Agricultural Counselor; Mr. Stanley Phillips, Agricultural Attaché; Mr. Piotr Rucinski, Agricultural Specialist, American Embassy in Warsaw; Dr. Ghias Mughal, Branch Chief, International Review Staff; and Dr. Oto Urban, Auditor, International Review Staff, USDA/FSIS. The following topics were discussed:

1. Contamination of offals from dressing operation in Establishment 267. This deficiency was corrected immediately by the establishment employees.

2. Condensation in different areas and different stages in Establishments 268, 131, 45 and 30180603. Except in Establishment 30180603, this deficiency was corrected immediately by the establishment employees.

3. There was a common source of water for suspect and non-suspect animals in the ate-mortem pen in Establishment 267. This deficiency was promised to be corrected by the Inspection Service of Poland as soon as possible.

4. Presence of insect (flies and spiders) in Establishment 30180603 was noted. No corrective action was taken either by establishment or Inspection Service.

5. Carcasses were not properly segregated on the suspect line in Establishment 33. Improvement was promised by the Polish Inspection Service.

6. Verification of CCP was not performed in Establishments 33 and 45. There was no CCP for prevention and monitoring of fecal contamination in Establishment 268. Change of the HACCP procedure by daily verification of CCP was promised by establishment officials.

7. Polish officials requested permission to export product containing chicken meat from Establishment 30180603. It was explained to government officials and establishment management that Poland has not been approved for export of poultry to the U.S.

Regarding the deficiencies that were corrected and not corrected in establishments (contamination of offals in Est. 267, condensation in Ests. 268, 131, 45 and 30180603, the common source of water for suspect and non-suspect animals in Est. 267, presence of insects in Est. 30180603, segregation of carcasses on the suspect line in Est. 33, verification of not performed in Ests. 33 and 45, and no CCP for fecal contamination in Est. 268), headquarters officials gave assurances that inspection personnel would monitor these areas more closely.

CONCLUSION

The inspection system of Poland was found to have effective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. Seven establishments were audited: six were acceptable, and one was evaluated as acceptable/re-review, in part due to lack of immediate corrective action. The deficiencies encountered during the on-site establishment audits, in those establishments which were found to be acceptable, were adequately addressed to the auditor's satisfaction.

Dr. Oto Urban
International Audit Staff Officer

(Signed) *Dr. Oto Urban*

ATTACHMENTS

A. Data collection instrument for SSOPs
B. Data collection instrument for HACCP programs
C. Data collection instrument for *E. coli* testing.
D. Data collection instrument for *Salmonella* testing

Attachment A

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1.Written program addressed	2. Pre-op sanitation addressed	3. Oper. Sanitation addressed	4. Contact surfaces addressed	5. Fre-quency addressed	6. Respons-ible indiv. Identified	7. Docu-mentation done daily	8. Dated and signed
66	√	√	√	√	√	√	No	No
267	√	√	√	√	√	√	√	√
45	√	√	√	√	√	√	√	√
33	√	√	√	√	√	√	No	√
131	√	√	√	√	√	√		√
268	√	No	√	√	√	√	√	√
30180603	√	√	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

101	√	No	√	√	√	√	√	√
46*								
67**	√	√	√	√	√	√	No	

*SSOP was not received from establishment
**Microbiological standard violation was recorded twice but corrective action was not taken

Attachment B

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment had conducted a hazard analysis.
3. The analysis includes food safety hazards likely to occur.
4. The analysis includes the intended use of or the consumers of the finished product(s).
5. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
6. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
7. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
8. The plan describes corrective actions taken when a critical limit is exceeded.
9. The HACCP plan was validated using multiple monitoring results.
10. *The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.*
11. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
12. The HACCP plan is dated and signed by a responsible establishment official.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conducted	3. All hazards identified	4. Use & users included	5. Plan for each hazard	6. CCPs for all hazards	7. Monitoring is specified	8. Corr. actions are described	9. Plan validated	10.Adequate verific. Procedures	11.Adequate documenta-tion	12. Dated and signed
66	√	√	√	√	√							
267	√	√	√	√	√	√	√	√	√	√		√
45	√	√	√	√	√	√	√	√	√	No	√	√
33	√	√	√	√	√	√	√	√	√	No	√	No
131	√	√	√	√	√	√		√	√	√	√	
268	√	√	√	√	√	√	√	√	√	No	√	√
30180603	√	√	√	√	√	√	√	√	√	√	√	√

45. Verification procedure was missing.
33. Verification procedure was missing.
Reassesment procedure was not identified by signature and date.
268. CCP for zero tolerance for fecal contamination not clearly understood.

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

101	√	√	√	√	√	√	√	√	√	No	√	√
46	√	√	√	√	√	√		√	√	No	√	√
67						No				No		

101. No HACCP verification process detected.
46. No HACCP verification process detected.
67. HACCP verification process missing.
Biological, chemical and physical hazard designation was missing.

Attachment C

Data Collection Instrument for Generic *E. coli* Testing

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli.*
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1.Written procedure	2. Sampler designated	3.Sampling location given	4. Predomin. species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
66	√	√	√	√	√	√	√	√	√	√
267	√	√	√	√	√	√	√	√	√	√
45	√	√	√	√	√	√	√	√	√	√
33	√	√	√	√	√	√	√	√	√	√
131	√	√	√	√	√	√	√	√	√	√
268	√	√	√	√	√	√	√	√		√
30180603	√	√	√	√	√	√		√		√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

101	√	√	√	√	√	√		√		√
46	√	√	√	√	√	√	√	√	√	√
67										

Attachment D

Data Collection Instrument for *Salmonella* testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. Salmonella testing is being done in this establishment.

2. Carcasses are being sampled.

3. Ground product is being sampled.

4. The samples are being taken randomly.

5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.

6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	*1. Testing as required*	*2. Carcasses are sampled*	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
66	√	√		√	√	√
267	√	√	No	√	√	√
45	√	√	No	√	√	√
33	√	√	No	√	√	√
131	√	√	No	√	√	√
268	√	√	No	√	√	√
30180603	√	√	N/A		√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

101	√	√	√	√	√	√
46	√	√	√	√	√	√
67						